

Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C. 20554

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FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

In the matter of

Application of BellSouth Corporation,)
BellSouth Telecommunications, Inc., and)
BellSouth Long Distance, Inc., for Provision)
of In-Region, InterLATA Service in the)
State of Louisiana)

CC Docket
No. 97-231

COMMENTS OF AT&T CORP.
IN OPPOSITION TO BELL SOUTH'S
SECTION 271 APPLICATION

APPENDIX - VOLUME III

ATTACHMENTS 34 - 55 TO THE AFFIDAVIT OF
JAY M. BRADBURY

**APPENDIX TO COMMENTS OF AT&T CORP.
IN OPPOSITION TO BELL SOUTH'S
SECTION 271 APPLICATION FOR LOUISIANA**

TAB	AFFIDAVIT	SUBJECT(S) COVERED
A	William J. Baumol	Public Interest
B	Robert H. Bork	Public Interest
C	Jay M. Bradbury	Operations Support Systems
D	Jim Carroll	AT&T Entry Plans
E	Robert V. Falcone and Michael E. Leshner	Unbundled Network Elements: Combinations
F	Jordan Roderick	PCS
G	Gregory R. Follensbee	Unbundled Network Elements: Pricing
H	R. Glenn Hubbard and William H. Lehr	Public Interest
I	Patricia A. McFarland	Resale Restrictions
J	Patricia A. McFarland	Section 272 Compliance
K	Sharon Norris	Operations Support Systems: Demonstration for La. PSC
L	C. Michael Pfau	Performance Measurements
M	James A. Tamplin, Jr.	Unbundled Network Elements

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1b	Letter from W. Scott Schaefer to William J. Carroll (Apr. 26, 1996)
1c	Letter from W. Scott Schaefer to William J. Carroll (Apr. 30, 1996)
1d	Letter from W.J. Carroll to W. Scott Schaefer (May 7, 1996)
1e	Letter from W. Scott Schaefer to William J. Carroll (May 16, 1996)
1f	Letter from W. Scott Schaefer to William J. Carroll (May 30, 1996)
1g	"White Paper - Application Access to Web Server" September 6, 1996
2	Testimony of Gloria Calhoun in Docket No. P-55 Sub 1022 (North Carolina Utilities Commission), transcript of September 25, 1997 hearing Vol. 7, pp. 89-96, and transcript of September 26, 1997 hearing Vol. 8, pp. 47-51
3	Testimony of Gloria Calhoun in Docket No. 25835 (Ala. PSC), transcript of August 19, 1997 hearing, pp. 526-28 and 686-687
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8	Letter from Cassandra Daniels (BellSouth) to Cindy Clark (AT&T), dated May 19, 1997
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63	BellSouth CLEC Forum -- October 30th and 31st, 1997
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65	Letter from Beverly Simmons (AT&T) to Melvin Porter (BellSouth), dated October 17, 1997
66	Charts Depicting BellSouth's Performance

ATTACHMENT 34

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BellSouth Interconnection Services

Facsimile

From
Department
Address

Margaret Levin 770-492-7537
AT&T Regional Account Team
1980 West Exchange Place
Suite 200
Tucker, GA 30084

Telephone number
Fax number

770-492-7550
770-492-9412

To

Pam Nelson

Telephone number

404-810-3100

Fax number

404-810-3131

Comments

*Items from 9/8 order
meeting.*

If this fax is not received in good order, please contact the sender listed above.

Date

9/15

Total number of pages

1+C

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ERRORS THAT WILL STOP THE PROCESSING OF A SERVICE REQUEST

Pending Service Orders	When LESOG goes out to get the existing record and finds that there are existing pending service orders on the account, LESOG will not process a new service order. This will fall to the center for manual handling /clarification.
---------------------------------------	--

Disconnected Account	When LESOG goes out to get the existing record and finds that the End User Account is in Final Status, whether due to a Disconnect or an outside move of service, or a Number Change, no service order will be processed.
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Skeletal Records Only	When LESOG goes out to get the existing record and finds that the Account is Skeletal Records Only, as in the case of an account that is billed to another account or an order to establish service is pending, but not posted.
----------------------------------	---

Missing Data	When any critical data; i.e., Telephone Number, Address, Listed Name is missing from the LSR, the service order can not be issued..
---------------------	---

Invalid NPA NXX	If the NPA NXX assigned does not match the address on the LSR, LESOG can not process a service order.
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The above input errors or system encounter errors are the most critical that we can think of that will stop the processing of a service request. There is not a existing list of these type errors. The above input is a collective effort on the part of Maggie Smith and myself. If you have any questions, please call me at 404 927-7391.

Cherry Smith

ATTACHMENT 35

Beverly Simmons

AT&T
Promenade II
Room 12N08
1200 Peachtree St., NE
Atlanta, GA 30309
404 810-4932

September 24, 1997

Margaret Garvin
BellSouth Interconnection Services
1960 West Exchange Place
Tucker, GA 30084

Dear Margaret:

This letter outlines some outstanding questions concerning the ordering process that we have been trying to resolve since May 2, 1997.

There are several questions concerning the LEO Guide and information which seems to be incorrect in the guide or not included at all. We have several questions about ordering Custom Ring.

Question - Is the Ringing Pattern switch dependent as indicated on the matrix in the LEO guide dated 4/97 ? or Can the customer select Ringing Pattern as indicated in the LEO guide dated 7/97 ?

Current process for Custom Ring service in conjunction with Remote Call Forwarding:
Custom Ring 1 & 2 - AT&T is sending FD (Feature Detail) of 'All' to call forward TNs 1 & 2.
Custom Ring (main number) - AT&T is sending FD (Feature Detail) of 'Main' to call forward main TN only.

Interim Process: BellSouth will accept FD of 'All', and write order with 'GOER' FID.

BellSouth will accept FD of 'Main' and write order with MCIF FID.

Note: On 9/15/97 Pat Rand indicated that the GOER FID was used for central office EWSD only.

Question - Is the GOER FID used in all central offices ?

Question - If the customer makes a change to remove Call Forwarding - would AT&T resend Custom Ring USOC with FID hanging off ? or send Custom Ring USOC without FID ?

What are the EDI labels when there's Feature Detail ? Do we include a virgule or a space ?

Remote Call Forwarding - PIN/PID Number - In Phase I BellSouth is assigning PIN/PID, and returning it in retained remarks on 865 completion transaction. BellSouth is indicating there's a security issue when providing PIN/PID in retained remarks.

Waiting for response - Pat Rand was going to verify the service order edit system to make sure that BellSouth wouldn't change the PIN/PID number if AT&T provided it.

If AT&T agrees to provide the PIN number, we would send on the initial order (850). If a customer calls AT&T to reset their PIN number, AT&T would call BellSouth as opposed to issuing a service order. We can't implement a process for PIN/PID until these questions are answered.

Please provide a response no later than September 25, 1997.

Sincerely,

A handwritten signature in cursive script, appearing to read "Beverly Simmons". The signature is fluid and elegant, with a long, sweeping tail on the final letter.

Beverly Simmons

ATTACHMENT 36

BellSouth & AT&T TCIF Issue 7
Concerns from 9/15 & 9/18 Meetings

Thursday, September 25, 1997

1. Can BST use AT&T's Gap Analysis format?

BellSouth's Gap Analysis format was established based on addressing all elements in a comparison from Phase II to TCIF Issue 7. This format was established prior to the receipt of AT&T's Gap Analysis.

2. AT&T requests separate, sub-meetings on Hunting, Directory Listings and LRN.

A. Hunting

BellSouth requests that AT&T send us a written list of hunting questions and we will respond in writing. After AT&T reviews, we will jointly determine if face-to-face meeting is needed.

B. Directory Listings

This will be worked in a separate team addressing Directory issues. Natasha Ervin from the Account Team and Kathy Massey from LC'SC Staff Support will lead the BellSouth Team. If AT&T feels that there are issues that are not being addressed, or have new issues, please advise us in writing of what they are.

C. LRN

BellSouth requests that AT&T send us a written list of LRN questions that will be forwarded to the LNP Project Team and addressed by that project team. Any data elements that are implemented in TCIF 17 will be addressed by this team.

3. Define the documentation

OBF Ordering Guide - Dated 12/2/96

LEO-IG, Volume 1, Issue 4, dated 7/97 (effective 8/1/97)

LSR Version 1 - released at OBF on 12/2/96

TCIF-EDI, Issue 7, dated June '97

4. Is BST's intent to maintain OBF standards and TCIF-EDI, Issue 7 (and/or issue 8) standards to the extent possible when developing each release of EDI?

Response: BST can only implement the TCIF-EDI, Issues once they are approved at TCIF-EDI. Currently, the only approved TCIF-EDI Issue is # 7, which is the one we are working. Issue 7 supports the Dec '96 OBF Standards. Issues 8 & 9 are being addressed at TCIF-EDI, but are not currently approved. The only field we have

BellSouth / AT&T TCIF Issue 7
Thursday, September 25, 1997
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investigated bringing forward from the OBF 4/18/97 Standards is the REQTYPE "M" to support LOOP/PORT Combo service. We agreed to bring forward if resolution is received from the courts/management before we finalize the requirements.

5. When will BST be ready (target) to enter into the change control process mode? (based on project plan) What is the process? Who will be the lead contact point in BST?

Response: Once the final mapping is complete, and BellSouth has baselined the requirements, BST can enter a change control process for documenting any changes to the mapping or LEO-IG Standards. The change control process is still being developed, however, all correspondence should be sent to the Account Team. The lead contact point in BST is the Account Team Staff (Marcia Moss).

6. What are the key deliverables & target dates for TCIF-EDI, Issue 7? Provide high level project plan.

Response: The key deliverables are the changes to the LEO-IG, Volume 1, Issue 7 (date to be determined), the TCIF-EDI mapping changes, a project plan providing the key dates relative to AT&T, and responses to questions as needed.

The milestones are:

<i>Draft EDI Tech Specs available to CLEC</i>	<i>10 27 97</i>
<i>Draft LEO-IG for TCIF Issue 7 available to CLEC</i>	<i>10 27 97</i>
<i>Final EDI Tech Specs available to CLEC</i>	<i>11 21 97</i>
<i>Syntax Test with CLEC</i>	<i>12 17 97-12 23 97</i>
<i>Production SRT begins</i>	<i>01 30 98</i>

7. Is BST using Phase 2 EDI as the basis/training block for TCIF-EDI, Issue 7 (LSR 1)?

Response: Yes

8. Is the LEO Guide up-to-date with Phase 2? with OBF-12/96? If not, when will the document be BellSouth certified?

BellSouth / AT&T TCIF Issue 7
Thursday, September 25, 1997
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Response: BST has a Release scheduled for implementation on 10/6/97. BST is currently documenting the changes to the LEO-IG, Volume 1, Issue 5 (effective date to be determined) based on the implementation 10.6.97. We have made every effort to be compliant with the OBF '96 Standards where those standards did not inhibit us from provisioning service to the CLEC's End User. Some fields are intentionally omitted from the LEO-IG, Volume 1, Issue 4 due to their inability to effectuate the provisioning of the service.

9. BellSouth and ATT will document all discussion items, questions, and answers to questions in writing in order to minimize interpretation communications gaps.

Response: We agree that both Companies will document issues and responses.

ATTACHMENT 37

ATTACHMENT 37

AT&T'S ATTEMPTS TO OBTAIN THE INTERFACES, SPECIFICATIONS AND BUSINESS RULES NECESSARY FOR THE ORDERING OF UNE COMBINATIONS

Establishment of specifications for access to UNE combinations is particularly important to AT&T, because UNE combinations are a critical part of AT&T's business plan for offering local exchange service in the BellSouth region. AT&T has repeatedly asked BellSouth to provide interfaces for UNE combinations, including the specifications and business rules that AT&T needs to use the interfaces.¹ Despite those requests, BellSouth has not provided AT&T with the interface design specifications that it will use to provide OSS access, and it has refused to commit to the business rules that it will use in accepting orders for UNE combinations. Further, even when AT&T has been able to obtain information from BellSouth, the value of that information has been subsequently negated by BellSouth's unilateral changes to specifications and business rules.

In a series of UNE combination implementation meetings with BellSouth, AT&T has diligently sought to obtain: (1) BellSouth's cooperation in developing an "eyechart" that would establish business requirements and business rules used to define EDI mapping for ordering UNE combinations, which in turn would allow AT&T to develop its internal systems so that local orders could be properly transmitted to BellSouth; and (2) BellSouth's commitment to support the

¹ See Attachment 37a (April 2, 1997 Letter from James S. Hill to Robert Echols).

value "M" in the "REQTYP" field on its Local Services Request ("LSR") form, which would enable AT&T to order UNE combinations via the EDI interface (the required "specifications").²

After an April 7, 1997 meeting, AT&T Negotiations and Implementation Manager James Hill asked BellSouth to confirm his understanding that (1) BellSouth and AT&T would complete and agree to an eyechart by April 28, 1997; (2) by May 1, 1997, BellSouth would be capable of receiving UNE combination orders via EDI; and (3) that orders for the UNE combinations known as the "UNE platform" could be placed by populating with an "M" the REQTYP field of BellSouth's LSR form.³ To date, BellSouth still has not committed to the business rules set forth in AT&T's eyechart, and except in Kentucky where it was ordered to do so by the Kentucky Public Service Commission, it has refused to support the value "M" necessary to place orders for the UNE platform via the EDI interface.⁴

Initially, development of the eyechart was delayed by BellSouth's failure to bring qualified Subject Matter Experts ("SMEs") to AT&T/BellSouth UNE platform meetings, and by its continuous rescheduling of conference calls and meetings. On May 12, 1997, AT&T Negotiations and Implementation Manager James Hill chronicled these delays to BellSouth

² AT&T has pursued only the EDI interface for UNE combination orders because (1) the LENS interface requires manual processing of all UNE combination orders once they are received by BellSouth, and (2) the EXACT interface is designed for ordering infrastructure such as trunks.

³ See Attachment 37b (April 10, 1997 Letter from James S. Hill to Robert Echols).

⁴ It is necessary to use the value "M" to place UNE-combination orders via the EDI interface because, as established by the OBF guidelines, the value "M" differentiates the port/loop combination from other orders such as for resale or individual UNEs.

Account Executive Robert Echols and impressed upon him the urgency of AT&T's UNE platform planning.⁵

Although BellSouth resolved to address AT&T's concerns regarding UNE platform entry "as soon as possible,"⁶ delays and cancellations continued. After failing to make EDI available for UNE combination orders on May 1, 1997 (or on revised May 11 and May 15, 1997 deadlines), in a May 29, 1997 meeting, BellSouth informed AT&T that the REQ TYP value of "M" was not yet available, and that therefore EDI could not be used for UNE platform orders. Further, on June 3, 1997, BellSouth canceled a critical June 4, 1997 UNE platform EDI eyechart meeting and proposed rescheduling the meeting for June 12, 1997, with a follow-up meeting to be held on June 25, 1997. Although BellSouth contended that the delay was necessary because AT&T had submitted a scenario eyechart (a description of the data elements that are required or optional for a specific order and service type) to BellSouth one day late and because the scenario eyechart was lengthy and difficult to read, it also admitted that the delay was in part occasioned because BellSouth had too many "internal issues" to resolve before it could meet with AT&T. Moreover, none of BellSouth's proffered reasons for cancellation justified the magnitude of the delay.⁷

To keep the negotiations moving, AT&T reluctantly agreed to BellSouth's proposed revised schedule of meetings as "worst case dates," but it urged BellSouth to hold full-

⁵ See Attachment 37c (May 12, 1997 Letter from James S. Hill to Robert Echols).

⁶ See Attachment 37d (May 28, 1997 Letter from Robert Echols to James S. Hill).

⁷ See Attachment 37e (June 4, 1997 Letter from Pamela Nelson to Terrie Hudson).

day, face-to-face meetings and to continue work through the week and weekend if final closure to the eyechart was not obtained in the June 25, 1997 meeting.⁸

At the June 25, 1997 BellSouth/AT&T meeting, BellSouth SMEs finally reviewed the eyechart in detail, and AT&T and BellSouth agreed, *inter alia*, (i) on negotiated business rules based on BellSouth's April 1997 Local Exchange Ordering Implementation Guide; (ii) on the data values contained in the eyechart; and (iii) that BellSouth would make available by December 15, 1997 the value of "M" in the REQTYP field identification of the EDI Local Service Request form to allow AT&T to order the combination of UNEs known as the UNE platform.⁹ Two days after this meeting, James Hill sent a letter to BellSouth Account Executive Marcia Moss, setting forth AT&T and BellSouth's June 25, 1997 joint resolution of issues. Emphasizing the critical nature of these issues to AT&T, Mr. Hill asked BellSouth to confirm its agreement by signing and returning the letter to AT&T by June 30, 1997.¹⁰

The progress made at the June 25, 1997 meeting proved illusory. In a voice-mail message to James Hill on June 30, 1997, Ms. Moss confirmed that the content and language of the letter corresponded to her understanding of the agreement, but stated that she could not immediately fax the letter with her signature because she was working at home.¹¹ On July 2,

⁸ See Attachment 37f (June 9, 1997 e-mail from James S. Hill to Marcia Moss).

⁹ See Attachment 37g (June 27, 1997 Letter from James S. Hill to Marcia Moss).

¹⁰ Id.

¹¹ See Attachment 37h (June 30, 1997 Telephone Log of James S. Hill, transcribing voice mail message from Marcia Moss).

1997, BellSouth advised AT&T that the letter had been sent to BellSouth's legal department for review.¹²

When AT&T had still not received the executed letter from BellSouth by July 29, 1997, James Hill again wrote to BellSouth and asked that the letter be signed and forwarded to AT&T by August 1, 1997.¹³ In an undated letter received by facsimile on August 7, 1997, BellSouth Sales Director Margaret Garvin responded that the UNE platform EDI requirements embodied in the eyechart were developed by AT&T "to assist [AT&T] in building your requirements and relating those requirements to your systems developers." She further stated, "BellSouth does not use these eyecharts that you develop for our requirements." She acknowledged that BellSouth agreed to assist AT&T by reviewing the eyecharts and that Marcia Moss had agreed that the letter "did correctly reflect some of the answers/issues addressed during the review of the eyecharts." Ms. Garvin concluded, however, that "it is inappropriate for BellSouth to sign an agreement based on your internal requirements documents and we will not do so."¹⁴

BellSouth's refusal to execute this letter effectively negated the progress made during the June 25, 1997 meeting toward developing business rules and specifications needed to support the placement of UNE combination orders over the EDI interface. BellSouth's rationalization for refusing to execute the letter was totally unjustified, because -- as explained to BellSouth by James Hill -- the UNE combination eyechart represented mutually agreed-upon

¹² See Attachment 37i (July 29, 1997 Letter from James S. Hill to Margaret Garvin).

¹³ Id.

¹⁴ See Attachment 37j (August 7, 1997 facsimile from Margaret Garvin to Jim Hill).

system requirements, which were based on BellSouth's own April 1997 Local Exchange Ordering Guide.¹⁵ BellSouth's failure to agree to the business rules and requirements embodied in the eyechart thus deprived AT&T of any assurance that it is developing a functional electronic interface to BellSouth or that it will be able to obtain UNE combination order flow between AT&T and BellSouth.

Moreover, in refusing to execute the June 27, 1997 letter, BellSouth abandoned its prior commitment to support the value of "M" in the REQ TYP field of the EDI LSR form. In a September 15, 1997 meeting with AT&T, BellSouth made its new position explicit, by informing AT&T that its December 15, 1997 version of EDI would not support the value "M" in the REQ TYP field.¹⁶ Moreover, in the present filing, Mr. Stacy acknowledges that BellSouth would have to develop further its interfaces to accommodate UNE combinations, and flatly states, "Since BellSouth is pursuing its legal disagreement with the FCC position on providing UNE combinations as a matter of law, we . . . have not yet undertaken such development." Stacy OSS Aff., ¶ 57. Without the availability of the value "M" in the REQ TYP field, AT&T cannot order UNE combinations via the EDI interface, nor can it effectively enter the market via the UNE combinations. See fn. 4, supra.

¹⁵ See Attachment 37k (August 25, 1997 Letter from James S. Hill to Margaret Garvin).

¹⁶ In yet another change of tack, BellSouth has recently indicated that in the Spring of 1998 it will implement the value "M" in the REQ TYP field, but only for Kentucky orders. Presumably, if UNE combination orders for customers in other states are placed across the interface, BellSouth will provision them as resale orders.

ATTACHMENT 37a